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Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

K.A.,

Plaintiff,

v.

MINDGEEK S.À.R.L., et al.,

Defendants.

Case No. 2:24-cv-04786-WLH-ADS

Hon. Wesley L. Hsu

**DEFENDANTS COLBECK  
CAPITAL MANAGEMENT, LLC;  
CB MEDIA VENTURES DD, LLC;  
CB AGENCY SERVICES, LLC; AND  
CB PARTICIPATIONS SPV, LLC'S  
NOTICE OF FILING OF OMNIBUS  
SUPPLEMENTAL BRIEF ON  
PLAINTIFFS' TVPRA  
CONSPIRACY CLAIMS IN  
RELATED CASE**

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that, pursuant to the Court's Amended Minute  
3 Orders on March 18 and 19, 2025, Defendants Colbeck Capital Management, LLC;  
4 CB Media Ventures DD, LLC; CB Agency Services, LLC; and CB Participations  
5 SPV, LLC (collectively, "CB Defendants") filed in *Fleites v. MindGeek, S.A.R.L., et*  
6 *al.*, No. 2:21-cv-04920-WLH-ADS ("*Fleites* Action"), an Omnibus Supplemental  
7 Brief on Plaintiffs' TVPRA Conspiracy Claims in Support of the CB Defendants'  
8 Omnibus Motion to Dismiss requesting that the Court dismiss with prejudice the  
9 Complaints filed by Plaintiffs in the following fifteen actions before the Court  
10 ("Actions"), including this action:

- 11 a. *Fleites* Action (CB Defs.' Mot. Dismiss, ECF No. 444-1);
- 12 b. *K.A. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04786-WLH-ADS  
13 (C.D. Cal. June 7, 2024) (CB Defs.' Omnibus Mot. Dismiss, ECF  
14 No. 74-1);
- 15 c. *N.L. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04788-WLH-ADS  
16 (C.D. Cal. June 7, 2024);
- 17 d. *L.T. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04791-WLH-ADS  
18 (C.D. Cal. June 7, 2024);
- 19 e. *T.C. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04795-WLH-ADS  
20 (C.D. Cal. June 7, 2024);
- 21 f. *X.N. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04800-WLH-ADS  
22 (C.D. Cal. June 7, 2024);
- 23 g. *N.Y. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04801-WLH-ADS  
24 (C.D. Cal. June 7, 2024);
- 25 h. *J.C. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04971-WLH-ADS  
26 (C.D. Cal. June 12, 2024);
- 27 i. *W.L. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04977-WLH-ADS  
28 (C.D. Cal. June 13, 2024);

- 1 j. *C.S. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04992-WLH-ADS  
2 (C.D. Cal. June 13, 2024);  
3 k. *S.O. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04998-WLH-ADS  
4 (C.D. Cal. June 13, 2024);  
5 l. *L.S. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-05026-WLH-ADS  
6 (C.D. Cal. June 14, 2024);  
7 m. *W.P. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-05185-WLH-ADS  
8 (C.D. Cal. June 20, 2024);  
9 n. *A.K. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-05190-WLH-ADS  
10 (C.D. Cal. June 20, 2024); and  
11 o. *J.L. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-07046-WLH-ADS  
12 (C.D. Cal. Aug. 20, 2024).

13 Dated: March 21, 2025

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14  
15 By:   
16 David G. Hille

17 Attorneys for Defendants  
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19 LLC; CB MEDIA VENTURES DD,  
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